

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Applicant:	Braudaway	Examiner: McLean, Neil R.
Serial No.:	10/630,289	Group Art Unit: 2625
Filed:	July 30, 2003	Docket No.: 8185P030

Title: Immediate Verification of Printed Copy

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**PRE-BRIEF CONFERENCE REQUEST**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Applicant respectfully requests review of the final rejection in the above-identified application which was mailed November 24, 2008. No amendments are being filed with this request. This request is being filed with a notice of appeal. The review is requested for the reasons stated on the following five (5) sheets.

### **REMARKS**

Applicant respectfully requests reconsideration of this application in view of the following remarks. This response is believed to fully address all issues raised in the Final Office Action mailed November 24, 2008. Furthermore, no new matter is believed to have been introduced hereby. Claims 1-29 were previously pending and remain pending in this application.

#### **35 USC §103 Rejection of the Claims**

##### **Claims Rejected in View of Horiguchi, Szeliski and Davidson**

Applicant submits that the present claims are patentable over any combination of Horiguchi, Szeliski and Davidson. Claim 1 of the present application recites an alignment process that creates an initial replacement image from the scanned image by performing an interpolation to generate additional lines in the scanned images to correspond to the digitized source images.

Horiguchi discloses a technique for inspecting picture patterns on prints which are being run in a rotary press, and more particularly to a method in which reference data read out of a reference print is written in a memory, and inspection data read out of a print under inspection is compared with the reference data for every picture element for instance to determine whether or not the print is acceptable, and an apparatus for practicing the method. The specific feature of the invention resides in that (1) in reading the above-described data a print running speed or the position of a picture pattern in the direction of width is detected to rewrite the reference data, (2) in data comparison, the comparison level is optionally set up, and (3) the data comparison is carried out not only for every picture element, but also for the sum of picture elements over the entire picture pattern and for the sum of picture elements arranged linearly in the print running direction. See Horiguchi at Abstract.

Szeliski discloses using an affine transform. See Szeliski at col. 13, ll. 10-36.

Davidson discloses a streaming mode encoder that receives incoming, sequential bands of an image. It buffers these bands in a band FIFO that is at least one block in height. A block in the context of image watermark encoding refers to the size of image data into which a watermark encoder module embeds an entire watermark signal instance. The FIFO includes two separate buffers, enabling the

embedder to load one with incoming data while performing embedding operations on image blocks in the other one. See Davidson at col. 5, ll. 42-51.

Applicant submits that a combination of Horiguchi, Szeliski and Davidson would fail to disclose or suggest a process of creating an initial replacement image from a scanned image by performing an interpolation to generate additional lines in the scanned images to correspond to the digitized source images. The Examiner asserts that Davidson discloses this feature at col. 5, ll. 42-51. See Final Office Action at Page 9, ll. 4-11.

Applicant respectfully disagrees with the Examiner's assertion. The passage of Davidson relied on by the Examiner recites:

FIG. 3 is a diagram of a streaming mode encoder. The streaming mode encoder receives incoming, sequential bands 300 of an image. It buffers these bands in a band FIFO 302 that is at least one block in height. A block in the context of image watermark encoding refers to the size of image data into which a watermark encoder module embeds an entire watermark signal instance. The FIFO includes two separate buffers, enabling the embedder to load one with incoming data while performing embedding operations on image blocks in the other one.

Davidson at col. 5, ll. 42-51.

The above-passage discloses an encoder that buffers bands of an image in a band FIFO and loading one buffer in the FIFO with incoming data while performing embedding operations on image blocks in the other FIFO. However, there is no reasonable suggestion of creating an *initial replacement image, or generating additional lines in a scanned image to correspond to digitized source images*. Thus, claim 1 is patentable over the combination of Horiguchi, Szeliski and Davidson since none of the references disclose or suggest creating an initial replacement image from a scanned image by performing an interpolation to generate additional lines in the scanned images to correspond to the digitized source images.

Claims Rejected in View of Hansen in view of Davidson

Applicant submits that the present claims are patentable over Hansen in view of Davidson. Claim 2 of the present application recites an alignment process that creates an initial replacement image from the

scanned image by performing an interpolation to generate additional lines in the scanned images to correspond to the digitized source images.

Hansen discloses a color registration control system for a printing press including an area scanner for acquiring an image of a paper substrate and an image processing system adapted to receive the image and process the image to determine any color register error. See Hansen at Abstract. Nevertheless, there is no disclosure or suggestion in Hansen of *creating an initial replacement image from a scanned image by performing an interpolation to generate additional lines in the scanned images to correspond to the digitized source images*.

As discussed above, Davidson fails to disclose or suggest such a process. Thus, any combination of Hansen and Davidson would fail to disclose or suggest the process. As a result, claim 2 and its dependent claims are patentable over Hansen in view of Davidson.

Claims 23 of the present application recites embedding two or more synchronization-strips into a digitized source image to form a marked source image to locate lines in a first stream of the digitized source image with a second stream of the digitized source image, wherein the synchronization-strips have a counter pattern at defined intervals to provide a unique page count.

Applicant submits that a combination of Hansen and Davidson would not disclose or suggest such a feature. However, the Examiner maintains that Davidson discloses this feature. See Final Office Action at Page 18, lines 4-13. Davidson discloses a watermark encoder that can be used to embed tracer data in an image as it is being printed or transferred. The forensic tracer data may include: data identifying the date of an activity from a clock in the imaging device or host computer of the driver, data identifying the serial number of a computer system, data identifying a serial number of a system component, data identifying a user of the computer system, data identifying a file, data indicating the nature of a detected event, data indicating the status of the computer system, data from a registry database, data relating to an external network connection, and data derived from a digital watermark payload. See Davidson at col. 9, ll. 45-56. Nevertheless, there is no disclosure in Davidson of *synchronization-strips that have a counter pattern at defined intervals to provide a unique page count*.

Moreover, it would not be obvious to one of ordinary skill in the art to combine Hansen and Davidson and to disclose the present claims. Particularly, it would not be obvious to combine the color register mechanism with the watermark encoder since they are used to implement two separate functions. As discussed above, Hansen uses color register marks to measure color register, while Davidson uses watermarks to embed data in an image. Accordingly, one of ordinary skill in the art would not be motivated to combine the color register mechanism taught in Hansen with the watermarks of Davidson.

For the foregoing reasons, claim 23 and its dependent claims are patentable over Hansen in view of Davidson.

Independent claim 27 includes limitations similar to those recited in claim 23. Therefore claim 27 is patentable over Hansen in view of Davidson for reasons similar to those discussed above with respect to claim 23.

Claim 28 recites a printer that prints a marked source image with embedded synchronization-strips in a sacrificial portion of a page to form a printed copy. Applicant submits that neither Hansen nor Davidson disclose or suggest such a feature. Therefore, claim 28 and its dependent claim are patentable over Hansen in view of Davidson.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 50-3669.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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